

<b>ADAIKKAPPAN v. LINA, Daniel M. McLean, Esq. attorney work</b>		
9/30/2016		Prepare LTD claim denial appeal letter for Defendant's mandatory internal appeal process
9/30/2016		Review e-mail from Client, re Client's request to Cigna for a copy of the LTD Policy
10/4/2016		Review e-mail and attachments from Client re Cigna failing to timely pay benefits for four months
10/11/2016		Review e-mail from Client, providing Summary Plan Description of LTD Policy
10/11/2016		Review LTD Policy Summary Plan Description
10/11/2016		Review e-mail from Client, forwarding e-mail chain between Client and Cigna re Cigna's difficulty understanding McKesson's bi-monthly pay schedule
10/11/2016		Review two e-mails from Client, re Cigna's demands for the same information over and over again
10/27/2016		Review e-mail from Client, re Cigna's non-responsiveness to Client's request for assistance
11/11/2016		Review e-mail from Client, re Cigna still hasn't paid first half of September 2016
11/20/2016		Revise LTD claim denial appeal letter for Defendant's mandatory internal appeal process
12/5/2016		Revise LTD claim denial appeal letter for Defendant's mandatory internal appeal process
1/12/2017		Finalize LTD claim denial appeal letter for Defendant's mandatory internal appeal process
2/6/2017		Phone call from CIGNA Group Insurance Appeal Specialist re need for Third-Party Authorization from completion
2/6/2017		Review e-mail from CIGNA Group Insurance Appeal Specialist memorializing phone conference and providing needed form for completion
2/6/2017		Send e-mail to Client, asking him to complete form and return it to me
2/7/2017		Review E-mail from Client, providing completed Third-Party Authorization form
2/8/2018		Send e-mail to CIGNA Group Insurance Appeal Specialist, providing completed Third-Party Authorization form
2/8/2017		Phone call from CIGNA Group Insurance Appeal Specialist asking if there is any additional documentation we want to add to record
2/12/2017		Review 2/8/17 correspondence from CIGNA Group Insurance Appeal Specialist, wherein Specialist claims a "special circumstance" and immediate release from 45-day regulatory obligation
4/2/2017		Review e-mail from Client, providing e-mails regarding difficulties with Cigna
5/15/2017	0.1	Phone conference with Client re next steps regarding Federal Court appeal
5/17/2017	1.5	Review Cigna's May 4, 2017 denial of benefits letter
5/16/2017	0.2	claim for benefits."
5/24/2017	0.1	Send copy of denial letter to Client
6/1/2017	1.0	Appear at E.D. Pa. Court admission ceremony; Clerk of Court
6/13/2017	6.0	Obtain and review Cigna case file consisting of only 624 pages (and w/o special deferential ACF form)

<b>ADAIKKAPPAN v. LINA, Daniel M. McLean, Esq. attorney work</b>		
7/9/2017	3.5	Pre-Complaint Legal Research - review ABA ERISA Survey of Federal Circuits; review applicable law; case law; damages available; who to sue (apparent split in Circuits on that issue)
9/8/2017	3.5	Pre-Complaint legal research - review of recent ERISA disability claims against LINA in E.D. Pa.
7/11/2017	4.5	Draft Complaint
7/11/2017	0.1	E-mail to Client re Draft Complaint attached for review
7/13/2017	0.1	Review response e-mail from Client re Draft Complaint
7/21/2017	0.1	Phone conference with Client re Draft Complaint
7/22/2017	0.1	Review e-mail from Client re follow-up on 7/21 conversation
8/16/2017	0.1	E-mails to/from Client, setting up 4pm phone conference
8/23/2018	0.5	Legal research - review E.D. Pa. Local Rules
8/23/2017	0.5	Legal research - initial PACER research in LINA cases
8/24/2017	0.1	Obtain August 15 and August 31 McKesson pay stubs
8/25/2017	0.2	Review e-mail and attachments from Client re Cigna's encouragement to file for SSDI
8/28/2017	1.0	Legal research - CIGNA v. Amara; ERISA 502(a)(3) - "equitable" not legal relief; Amara expansion of equitable remedies to unjust enrichment & surcharge; fiduciary duty, misrepresentation; other case law
8/30/2017	0.8	Phone conference with Client re social security benefits, encouraged to file, have to leave work 30 days, Cigna works with third party to file, started @ McKesson Dec. 2013, out of work 9 mos., then gradual return, then half-time
9/8/2017	0.1	E-mail to Client re status update and setting up next phone conference
9/8/2017	5.0	Legal research - review May 23, 2013 Regulatory Settlement Agreement (Michael Consedine - Pa.); 29 CFR 2560.503-1 <i>et seq.</i> ; Cal. Dept. of Ins. Exhibit A; LTD 24-month issue added to complaint
9/15/2017	0.1	occupation standard
9/15/2017	0.1	E-mails to/from Client, rescheduling phone conference to 9/21/17
9/15/2017	0.8	Finish writing Complaint
9/21/2017	0.6	Phone conference with Client, reviewing complaint, offering five modifications & clarifications
10/2/2017	0.1	Receive filing fee from Client
10/12/2017	0.1	Phone call from A. Kline, Esq. introducing herself and requesting extension of time to respond to Complaint
10/12/2017	0.1	Review e-mail from A. Kline, Esq. requesting, in writing, extension of time to respond to Complaint
10/12/2017	0.1	Send response e-mail to A. Kline, Esq., agreeing to extension of time request
10/12/2017	0.1	Review reply e-mail from A. Kline, Esq.
10/13/2017	0.1	Review e-mail from A. Kline, Esq. re proposed stipulation extending time
10/13/2017	0.1	Response e-mail to A. Kline, Esq., correcting spelling of my last name
10/13/2017	0.1	Reply e-mail from A. Kline, Esq., re correcting spelling of my last name
10/13/2017	0.2	extending time
10/13/2017	0.2	Review Docket Entries 2, 3, and 4, Notice of Appearance on behalf of LINA.

<b>ADAIKKAPPAN v. LINA, Daniel M. McLean, Esq. attorney work</b>		
10/13/2017	0.1	Review Docket Entry 5, Corporate Disclosure Statement
10/16/2017	0.1	Review Docket Entry 6, Stipulation and Order extending time to respond to complaint
11/29/2017	0.1	Review e-mail from A. Kline, Esq. re requests for employment status and paystubs from 9/15/16 to present
11/29/2017	0.1	Response e-mail to A. Kline, Esq. confirming Client remains working half-time status with same employer since 9/16/16; paystubs not immediately available
11/29/2017	2.0	Review Docket Entry 7, LINA's Motion and Memorandum to Dismiss Counts II through VI, and 36 pages of Exhibits
11/29/2017	0.3	Phone conference with Client re Motion to Dismiss
11/30/2017	2.0	Legal research - Motion to Dismiss
11/30/2017	0.1	Review e-mail from A. Kline, Esq. asking for Client's salary; information needed "to do a benefits calculation."
11/30/2017	0.1	Response e-mail to A. Kline, Esq. stating that Client will provide paystubs with salary info
12/1/2017	0.2	Review two e-mails from Client, providing copies of 29 paystubs
12/4/2017	0.1	E-mail to Client providing Motion to Dismiss Counts II through VI, setting up phone conference for 12/6/17
12/5/2017	0.1	Review response e-mail from Client, confirming phone conference on 12/6/17
12/6/2017	0.4	E-mail to A. Kline, Esq., providing 15 of 29 requested paystubs
12/6/2017	0.3	Second e-mail to A. Kline, Esq., providing the other 14 requested paystubs
12/6/2017	0.1	Review two response e-mails from A. Kline, Esq., acknowledging receipt of paystubs
12/6/2017	0.7	Phone conference with Client re Motion to Dismiss and our response
12/11/2017	2.0	Legal research re Motion to Dismiss Counts II through VI
12/12/2017	0.2	Draft response to Motion to Dismiss Counts II through VI
12/13/2017	0.1	E-mail to Client re decision not to contest Motion to Dismiss Counts II through VI
12/13/2017	0.1	Phone conference with Client re motion to dismiss response
12/15/2017	0.1	Review Docket Entry 9, Order dismissing Counts II through VI
12/19/2017	0.3	Phone conference with Client re status of case and next steps
12/28/2017	0.1	Review e-mail from A. Kline, Esq., requesting a one-week extension to answer Complaint, "[i]n light of the timing," and because client was "out of the office until January[.]"
12/29/2017	0.1	Review reply e-mail to A. Kline, Esq., agreeing to requested extension
1/1/2018	0.1	E-mail to Client, wishing happy new year, noting LINA's one-week extension to Answer, setting up phone conference 1/12/18
1/2/2018	0.1	Review e-mail from A. Moran, Esq., providing submitted stipulation to extend time to answer Complaint, due to "the length of the Complaint"
1/2/2018	0.1	Review stipulation to extend time to answer Complaint
1/2/2018	0.2	Response e-mail to A. Moran, Esq. and A. Kline, Esq., complaining about the unauthorized change of rationale given to the Court
1/2/2018	0.1	Review reply e-mail from A. Kline, Esq., agreeing that "the reference to the length of the complaint" was her error

<b>ADAIKKAPPAN v. LINA, Daniel M. McLean, Esq. attorney work</b>		
1/3/2018	0.2	Review Docket Entry 10, Stipulation to extend time to answer complaint
1/4/2018	0.1	Review response e-mail from Client, confirming phone conference on 1/12/18
1/9/2018	1.4	Review Docket Entry 11, Answer to Complaint, with Affirmative Defenses; compare to Complaint
1/9/2018	0.1	E-mail to Client, providing copy of LINA's Answer
1/10/2018	0.3	Review Docket Entry 12, Order for Rule 16 Conference
1/12/2018	0.4	Conference
1/25/2018	0.1	requesting a demand
1/25/2018	0.1	Response e-mail to A. Kline, Esq., stating demand likely next week, after client discussion
1/25/2018	0.1	E-mail to Client re LINA's invitation to provide settlement demand, setting up phone conference
1/25/2018	0.5	Review Judge's rules
1/25/2018	0.8	Phone conference with Client re LINA's invitation to provide settlement demand and next steps
1/27/2018	0.1	Google sheets message to Client, providing shared spreadsheet based on pay stubs, to determine future benefit payments
1/27/2018	0.1	E-mail to Client, requesting December and January paystubs
1/28/2018	0.2	Review response e-mail from Client, correcting my calculations
1/28/2018	0.1	Review response e-mail from Client, providing December and January paystubs
1/29/2018	0.1	Review e-mail from Client, requesting to postpone phone conference to after 4:30pm
1/29/2018	0.1	Response e-mail to Client, confirming phone conference after 4:30pm, and thanking for spreadsheet
1/29/2018	0.2	Phone conference with Client re settlement spreadsheet
1/29/2018	0.1	Research into proposed interest rates for settlement calculations
1/30/2018	0.1	E-mails to/from Client, scheduling next phone conference
1/30/2018	0.3	Review e-mail from Client, providing updated spreadsheet with simple interest for requested settlement demand
1/31/2018	0.4	E-mail to A. Kline, Esq., providing requested settlement demand with detailed explanations for figures
2/4/2018	0.5	Prepare Joint Rule 16 statement
2/5/2018	0.6	Phone conference with Client re Joint Rule 16 Statement and next steps
2/6/2018	0.1	Phone conference from Client re possibility of settlement
2/7/2018	0.2	E-mail to A. Kline, Esq., inquiring about lack of response to settlement demand, and providing proposed Joint Rule 16 statement
2/8/2018	0.2	Review response e-mail from A. Kline, Esq., re summary judgment deadline, and LINA's calculations of past claimed and future benefits differing from ours
2/8/2018	0.1	E-mail to Client, inquiring about lowest acceptable interest payment
2/8/2018	0.4	Phone conference with Client about tomorrow's Conference
2/9/2018	0.4	Appearance at Joint Rule 16 Conference
2/9/2018	0.2	Post-Conference discussion with A. Kline, Esq. re LINA's calculations of past claimed and future benefits greatly differing from ours

<b>ADAIKKAPPAN v. LINA, Daniel M. McLean, Esq. attorney work</b>		
2/9/2018	0.8	Phone conference with Client re discussions at and after Rule 16 Conference; possibility of trying to bring in Jenkintown disability attorneys
2/10/2018	1.5	Legal research - similar LINA litigation; review other summary judgment motions & memoranda; significance of LTD Policy's 24-month/SSDI clause
2/12/2018	0.1	Review e-mail from Client re possibility of bringing in additional counsel
2/12/2018	0.1	Four follow-up e-mails to/from Client, setting phone conference time for 4pm
2/12/2018	0.2	Review Docket Entry 15, Order for Settlement Conference
2/12/2018	0.3	Phone conference with Client re upcoming settlement conference, possibility of additional counsel, desire to have me maintain lead counsel role
2/13/2018	0.2	Legal research - phone conference with N. DeMis, Esq. (Heidrich v. LINA, 5/2/17)
2/15/2018	0.1	Legal research - phone conference with M. Salmanson, Esq. (referred by N. DeMis, Esq.)
2/15/2018	0.1	Legal research - e-mail to M. Salmanson, Esq., providing copy of LTD Policy for review
2/20/2018	0.2	Legal research - phone conference with M. Salmanson, Esq., discussing LTD Policy, LINA counsel, and Judges
2/15/2018	0.3	Review LINA's Rule 26(A)(1) Initial Disclosures
2/18/2018	2.5	Initial review of LINA's 1277-page Administrative Record (without exhibit list)
2/22/2018	0.5	Legal research - SSDI law and practice
2/23/2018	0.6	benefits
2/23/2018	0.3	Response e-mail to A. Kline, Esq., noting impossibility of LINA's calculations, and suggesting wrong calculation used
2/23/2018	0.1	E-mail to Client, to set up phone conference time
2/23/2018	1.0	Phone conference with Client re frustration with LINA's calculations, confirming they used incorrect formula, SSDI's List of Impairments, next steps
2/23/2018	0.1	Post-call follow-up e-mail to Client, providing SSDI List of Impairments, 4.00 et seq. (cardiovascular)
2/26/2018	0.1	E-mail to Client, asking for SSDI estimated payment amount confirmation
2/26/2018	0.1	Review response e-mail from Client, confirming \$2088/month estimate
2/27/2018	0.4	Review e-mail from A. Kline, Esq., providing basis for LINA's calculations
3/1/2018	1.4	Reply e-mail to A. Kline, Esq., providing the <i>applicable</i> Return to Work calculation, with page numbers showing where the concepts are found in the LTD policy.
3/1/2018	0.1	Create LTD Settlement Calculations spreadsheet for opposing counsel
3/5/2018	0.1	Re-review LINA's Rule 26 production
3/5/2018	0.1	Re-review settlement calculations
3/6/2018	0.3	Review e-mail from A. Kline, Esq., claiming that LINA "copied the incorrect number into their calculation" and reaching near agreement on first 24 months theoretically payable.
3/8/2018	0.3	opposing counsel
3/8/2018	0.3	opposing counsel

<b>ADAIKKAPPAN v. LINA, Daniel M. McLean, Esq. attorney work</b>		
3/8/2018	0.1	Reply e-mail to A. Kline, Esq., proposing to calculate the post-24 month, future benefits calculation for settlement discussion purposes
3/8/2018	0.1	Google Sheets message to Client, asking for permission to send sheet to opposing counsel for settlement purposes
3/8/2018	0.1	conference tomorrow
3/9/2018	0.8	Calculate monthly benefit payments from April 5, 2018 through March 2048; using calculated average CPI-W over prior 20 years; developing basis for total settlement offer
3/9/2018	0.8	Phone conference with Client re settlement spreadsheet updates with figures through March 2048
3/12/2018	0.1	Review e-mail from Client, asking for phone conference on 3/13/18 instead of today
3/12/2018	0.1	Response e-mail to Client, setting phone conference time for 4pm on either 3/15 or 3/16
3/15/2018	0.1	Review development in Cigna RICO class action in D. Conn.
3/16/2018	0.1	Review e-mail from Client re own occupation, any occupation, and filing for SSDI
3/16/2018	1.5	Phone conference with Client re finalization of settlement spreadsheet, showing detailed calculations supporting settlement figure request
3/16/2018	0.4	Write explanations for the settlement calculations before sending to opposing counsel
3/17/2018	0.2	Review e-mail from Client, providing disability earnings from January through March 15, and updating spreadsheet
3/18/2018	0.2	Finalize total settlement calculation for submission to opposing counsel
3/18/2018	0.2	Phone conference with Client re settlement demand requested by opposing counsel
3/18/2018	0.5	Draft LTD Settlement Calculations for opposing counsel
3/18/2018	0.1	E-mail to A. Kline, Esq., with detailed settlement offer, with supporting benefit calculations, attached
3/18/2018	0.1	E-mail to Client, regarding 2014 medical records, seeking confirmation LINA had them in 2014
3/19/2018	0.1	Review e-mail from Client, providing paystubs for February and March 15
3/22/2018	0.1	E-mail to Client, asking for phone conference regarding strategy going forward
3/23/2018	0.1	Review response e-mail from Client, confirming phone conference at 4pm
3/23/2018	0.4	Phone conference with Client, discussing strategy going forward and next steps
4/6/2018	0.2	Review Docket Entry 16, Order re Summary Judgment motions and Oral Argument
4/16/2018	0.2	Review Docket; calendar Magistrate Judge deadline
4/16/2018	4.0	Review approximately one-third of 1277-page Administrative Record lacking exhibit list; summarize contents
4/17/2018	4.0	Review 2nd third of 1277-page Administrative Record; summarize contents
4/18/2018	4.0	Review last third of 1277-page Administrative Record; summarize contents
4/19/2018	1.0	Begin Settlement Conference submission
4/19/2018	0.5	Begin Summary Judgment memorandum
4/20/2018	1.0	Continue Settlement Conference submission



<b>ADAIKKAPPAN v. LINA, Daniel M. McLean, Esq. attorney work</b>		
4/20/2018	0.5	Continue Summary Judgment memorandum
4/23/2018	0.1	Review e-mail from Magistrate Judge Heffley re settlement conference summaries
4/23/2018	0.1	E-mail to Client, seeking telephone meeting time
4/24/2018	0.1	Review response e-mail from Client, indicating he would call
4/24/2018	0.6	Phone conference with Client re upcoming settlement conference, outstanding settlement demand, briefing and expected legal process; differences from India, etc.
4/24/2018	0.1	E-mail from Client, providing printout of SSDI estimated benefit amount for settlement conference purposes
4/26/2018	0.2	Review e-mail from A. Kline, Esq., responding to 3/18/18 settlement demand
4/27/2018	0.3	Reply e-mail to A. Kline, Esq., responding to four points raised in A. Kline, Esq.'s 4/26/18 e-mail
4/27/2018	0.2	Review e-mail from Client, offering clarification on Dependent Benefits, notes from SSA phone conference and question re family maximum
4/27/2018	0.2	Review e-mail from Client, noting SSDI List of Impairments 5.08, 4.11, and 9.00 with osteopenia, with corroborating lab results
4/30/2018	3.5	Finalize Settlement Conference submission for Client review
5/1/2018	0.2	Settlement Conference Prep: Reduce future earnings calculations to present-day value (PDV) for Settlement Conference; calculate LINA liability as AGDB minus 150% of SSD
5/1/2018	0.2	Settlement Conference Prep: Further calculations to PDV as 62% of total liability (using lottery lump sum reduction formula)
5/1/2018	0.1	E-mail to A. Kline, Esq., asking if LINA would consent to allowing Client to participate via teleconference in mandatory Settlement Conference
5/1/2018	0.1	Response e-mail from A. Kline, denying request to allow Client to participate remotely in the mandatory Settlement Conference
5/1/2018	0.1	E-mail to Client, providing copy of Settlement Conference Memorandum for review
5/1/2018	0.1	Review response e-mail from Client re possible employer termination of health benefits and scheduling phone conference for 8pm
5/1/2018	0.1	Response e-mail to Client re SSDI list of impairments, recent BMI records, skin ulcerations
5/1/2018	1.1	Phone conference with Client re settlement conference memorandum and strategy for next steps
5/2/2018	0.3	Review reply e-mail from Client re inquiry with Riddle vascular clinic re BMI, adrenals and low BP, and venous stasis/brawny edema, and providing recent medical records
5/2/2018	0.2	Review 2nd reply e-mail from Client re BMI, ulcerations, brawny edema, response from Crozer vascular clinic, and providing additional medical record
5/2/2018	0.2	Submit Settlement Conference Summary and Memorandum via e-mail to Magistrate Judge Heffley
5/2/2018	0.1	Review reply e-mail from Magistrate Judge Heffley, acknowledging receipt of submission

<b>ADAIKKAPPAN v. LINA, Daniel M. McLean, Esq. attorney work</b>		
5/2/2018	0.4	Phone conference with Client re SSDI list of impairments, and recent medical record requests and responses
5/4/2018	0.1	Review e-mail from A. Kline, Esq., noting LINA's pre-conference settlement offer
5/4/2018	0.1	Reply e-mail to A. Kline, Esq., thanking for offer
5/4/2018	0.2	E-mail to Client re LINA's pre-conference settlement offer, possible next steps
5/5/2018	0.1	E-mail from Client re LINA's offer
5/7/2018	0.1	Settlement Conference
5/7/2018	0.1	Response e-mail to Client, noting a couple of points about formalities, and setting up phone conference for 5/8/18 afternoon
5/8/2018	0.2	Review e-mail from Client, providing images showing 60-month "any occupation" language before SSDI mandate, and annual CPI-W increase
5/8/2018	0.4	Phone conference with Client re tomorrow's mandatory Settlement Conference and associated formalities
5/9/2018	1.0	Prehearing discussion with Client <i>en route</i> to courthouse, preparation for same
5/9/2018	0.7	Appearance at Settlement Conference with Magistrate Judge Heffley
5/9/2018	0.1	Review e-mail re Docket Entry 17, Settlement Conference Minute Entry
5/9/2018	0.9	Phone conference with Client re debriefing Settlement Conference and strategizing next steps
5/17/2018	0.9	Phone conference with Client re surgery contraindication, progressive nature of vascular condition
5/18/2018	0.1	Review e-mail from Client, noting employer switch to different LTD carrier
5/20/2018	8.0	Organize 1277-page Administrative Record without exhibit list into chronological order
5/22/2018	0.2	Review AR0304 and 0333 - the only way to know if qualifying for SSDI is to apply; denial overturned
5/23/2018	0.2	Figure out difference in roles between Cigna employees E. Contreras, N. Contreras & S. Burns
5/25/2018	2.0	Legal research - burden of A.R. production, exhibits; LINA state regulatory sanctions
5/26/2018	1.1	Draft argument against ACF applicability
5/26/2018	6.1	Write Statement of Facts Not Genuinely in Dispute
5/26/2018	5.3	Write Memorandum for Summary Judgment
5/27/2018	3.1	Finish writing Memorandum for Summary Judgment
5/28/2018	0.1	E-mail to Client, attaching for review Memorandum and Statement of Facts, requesting recent medical record re BMI & Osteopenia
5/29/2018	0.1	Response e-mail from Client, setting up time for phone conference to discuss Summary Judgment Memorandum
5/29/2018	0.1	Reply e-mail to Client, seeking better quality scan with PII re BMI
5/29/2018	0.2	Review post phone conference e-mail from Client, wherein Client quotes key passages of 12 pages of Administrative Record from his review of the A.R.
5/29/2018	0.2	Review 2nd post phone conference e-mail from Client, detailing his progression of venous insufficiency with references to 7 pages of the A.R.



<b>ADAIKKAPPAN v. LINA, Daniel M. McLean, Esq. attorney work</b>		
5/29/2018	0.1	Review two response e-mails from Client, providing improved quality scans - BMI report and Osteopenia findings
5/29/2018	1.0	Phone conference with Client, going over Summary Judgment Motion and Memorandum
5/30/2018	0.1	File Motion for Summary Judgment and exhibits
5/30/2018	4.0	Review LINA's Motion for Summary Judgment and exhibits
5/31/2018	0.2	Memoranda for review
6/1/2018	0.1	Legal research - availability of California law
6/1/2018	0.6	Phone conference with Client, going over LINA's Summary Judgment Memorandum
6/2/2018	2.0	Legal research - undated ACF, no effective date; illegal in California (McKesson HQ); can Cal. company avoid Cal. law; Can "Plan document" circumvent Cal. insurance law, or must Cal. law apply to Cal. insurance policy
6/4/2018	0.1	Review e-mail from A. Moran, Esq., requesting consent to joint motion to file administrative record under seal
6/4/2018	0.1	Response e-mail to A. Moran, Esq., agreeing to request to file administrative record under seal
6/4/2018	0.1	Review Docket Entry 20, Joint Motion for Leave to File Documents Under Seal
6/5/2018	3.0	Legal research - EDGAR research into Defendant ownership and executive leadership; discover Gregory Wolf left company before LTD policy issued, CIGNA 8-K, Item 1.01, 12/8/05, Item 10.3; therefore G. Wolf could not have signed ACF <i>after</i> policy issued, because G. Wolf terminated <i>before</i> policy issue date
6/6/2018	2.5	Draft Response to Defendant's Motion for Summary Judgment
6/7/2018	2.5	Continue drafting response to Defendant's Motion for Summary Judgment
6/8/2018	0.1	Review e-mail from Client, providing recent medical report with list of medical conditions
6/8/2018	0.5	Phone conference with Client re upcoming Response Memorandum; review and recommendations
6/13/2018	0.1	File Docket Entry 21 - Plaintiff's Response to Defendant's Motion for Summary Judgment with exhibits
6/13/2018	0.2	Phone conference with Client re briefing and next steps
6/13/2018	2.5	Review Docket Entry 22 - Defendant's Response to Plaintiff's Motion for Summary Judgment and exhibit
6/14/2018	0.2	E-mail to Client, providing copies of Plaintiff's and Defendant's Response Memoranda for review, setting time for phone conference
6/14/2018	2.5	Judgment and exhibit
6/14/2018	0.1	Review Docket Entry 23 - Order granting motion to file administrative record under seal
6/15/2018	0.1	Review response e-mail from Client, confirming time for phone conference
6/15/2018	0.5	Phone conference with Client, going over LINA's Response Memorandum
6/18/2018	0.1	sent in February

<b>ADAIKKAPPAN v. LINA, Daniel M. McLean, Esq. attorney work</b>		
6/18/2018	0.1	Response e-mail to A. Kline, Esq., providing a copy of the fax transmission and report
6/20/2018	0.6	Review Docket Entry 25 - Defendant's Reply Brief
6/20/2018	0.2	Review LTD Summary Plan Description for Reply Brief preparation
6/20/2018	4.1	Write Plaintiff's Reply Brief
6/20/2018	0.1	File Docket Entry 26 - Plaintiff's Reply Brief
6/21/2018	0.2	Phone conference with Client re filing Reply Brief late last night
6/22/2018	0.1	E-mail Client, providing Plaintiff's and Defendant's Reply Memoranda for review
6/22/2018	0.1	Review response e-mail from Client, setting time for phone conference to discuss
6/22/2018	0.1	Review e-mail from Client, rescheduling phone conference
6/23/2018	0.9	Phone conference with Client re upcoming Oral Argument, preparation, strategy, Court customs and formalities
6/26/2018	0.3	Phone conference with Client re family attendance pros and cons
6/26/2018	1.0	Discussion with Client <i>en route</i> to Courthouse re plan, strategy, formalities
6/26/2018	1.0	Appear at Oral Argument
6/26/2018	1.0	Discussion with Client on way home from Courthouse, debriefing the Oral Argument proceedings
7/24/2018	0.1	E-mails to/from Client, scheduling time for status update phone conference
7/26/2018	0.3	Phone conference with Client re status update, anticipated outcome timeframe
8/2/2018	0.1	E-mails to/from Client, planning next status update for mid-August
8/16/2018	0.1	E-mails to/from Client, rescheduling next status update for late August
8/24/2018	0.1	Phone conference with Client re status of case
8/28/2018	0.6	Phone conference with Client re SSDI application, SSI benefits, question re marriage type, ERISA status
9/25/2018	0.1	Phone conference with Client re status of case unchanged
10/5/2018	0.1	Phone conference with Client re status of case unchanged
10/19/2018	0.1	SMS text to Client, sorry missed your call, no update to status
10/30/2018	0.1	Phone conference with Client re status of case unchanged
11/15/2018	0.1	Phone conference with Client re status of case unchanged
12/7/2018	0.1	E-mail to Client, status of case unchanged
12/21/2018	0.1	Phone conference with Client re status of case unchanged
1/4/2019	0.1	Phone conference with Client re status of case unchanged
1/25/2019	0.1	Phone conference with Client re status of case unchanged
2/1/2019	0.1	Review Docket Entry 28 - LINA's Corporate Disclosure Statement Form
2/1/2019	0.3	Phone conference with Client re update in case and strategy going forward
2/18/2019	0.1	SMS text to Client, setting up status update phone conference time
2/19/2019	0.2	Phone conference with Client re case status
3/20/2019	0.1	SMS text to Client, setting up status update phone conference time
3/21/2019	0.3	Phone conference with Client re case status and next steps
3/22/2019	0.1	Phone call to Chief Judge's Chambers, inquiring about status, informed Order mailed out yesterday
3/22/2019	0.1	Review E-mail from ECF System, indicating Plaintiff's Motion Granted
3/22/2019	0.1	Phone conference with Client, explaining outcome of case, next steps

<b>ADAIKKAPPAN v. LINA, Daniel M. McLean, Esq. attorney work</b>		
3/22/2019	0.1	SMS texts to/from Client, explaining could not provide documents as planned because under seal, will provide as soon as possible
3/22/2019	0.1	E-mail to Client, forwarding ECF e-mail for confirmation of outcome, setting up time for phone conference
3/22/2019	0.3	Follow-up Phone conference with Client, explaining outcome and next steps
3/22/2019	0.1	Review e-mail from Client, noting that 3rd round of SSDI claim review is complete, and decision letter to be mailed soon
3/25/2019	1.5	Review Memorandum Opinion received in mail
3/25/2019	0.3	Phone conference with Client re SSDI - QR finished, benefits payable 7th month after filing date of 7/14/18
3/25/2019	0.1	E-mail to Client, providing copy of sealed Memorandum Decision with instructions not to share with others at this time
3/26/2019	0.3	E-mails to/from Client, asking for paystubs from March 30 2017 to April 15, 2018, info on any other gov't benefits rec'd up to 4/6/18 and beyond
3/26/2019	0.2	E-mails to/from Client, providing shareable Order, and agreeing to timetable for producing needed information
3/27/2019	0.1	Phone conference with Client, stating that SSDI monthly benefit will be \$2090.00, retroactive to January 2019 (filed Jul. 2018), should receive formal approval letter in 1-2 weeks.
3/31/2019	3.0	Draft Declaration in Support of Motion and Memorandum for Attorneys Fees and Costs
3/31/2019	3.0	Legal research - ERISA attorney fee awards
4/1/2019	3.0	Draft Memorandum for Attorneys Fees and Costs
4/1/2019	3.0	Further legal research - reasonable rates and hours
4/2/2019	3.0	Further draft Memorandum for Attorneys Fees and Costs
4/3/2019	2.0	Finalize Memorandum for Attorneys Fees and Costs
\$425/hr x	181.7	\$77,222.50